

EXHIBIT A

(Ordinary Course Professional Declaration)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

DECLARATION AND DISCLOSURE STATEMENT OF JOHN McCAUGHRAN QC.

JOHN McCAUGHRAN QC declares and says:

1. I am a Queen's Counsel, located at One Essex Court, Temple, London, EC4Y 9AR, United Kingdom.
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal advice and representation to the Debtors, and I have consented to provide such services.
3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. I have not agreed to share and will not share any portion of the compensation to be received from the Debtors with any other person other than by discharging the regular expenses incurred in connection with the administration of the barristers' chambers of which I am a member.

5. I do not hold or represent any interest adverse to the Debtors or their estates.

6. The Debtors do not owe me anything in respect of prepetition services.

7. If at any time during the period of my employment, I discover any facts bearing on the matters described herein, I will supplement the information contained in this Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: London, United Kingdom
13 October 2011



John McCaughran QC

EXHIBIT B

(Retention Questionnaire)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
	:
	:
-----X	

Chapter 11 Case No.
08-13555 (JMP)
(Jointly Administered)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Candace Arthur
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

John McCaughran QC, One Essex Court, Temple, London, EC4Y 9AR

2. Date of retention: January 7, 2010 as De Minimis OCP pursuant to the
Amended OCP Order

3. Type of services provided (accounting, legal, etc.):

Legal

4. Brief description of services to be provided:

Legal

5. Arrangements for compensation (hourly, contingent, etc.)

NA

- (a) Average hourly rate (if applicable):

NA

- (b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

NA

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$ NA

Date claim arose: _____

Source of Claim: _____

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: NA

Status: NA

Amount of Claim: \$ _____

Date claim arose: _____

Source of claim: _____

8. Stock of the Debtors currently held by the firm:

Kind of shares: NA

No. of shares: _____

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: NA

Status: _____

Kind of shares: _____

No. of shares: _____

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

NA

11. Name of individual completing this form:

John McCaughran QC

John McCaughran